1			Magistrate Judge Mary Alice Theiler			
2						
3						
4						
5						
6						
7	UNITED STATES DISTRICT COURT FOR THE					
8	WESTERN DISTRICT OF WASHINGTON AT SEATTLE					
9						
10	UNITED	STATES OF AMERICA,	NO. MJ20-553			
11		Plaintiff,	MOTION FOR DETENTION			
12			WOTION TOR DETENTION			
13	v.					
14	SAMI C. HORNER,					
15		Defendant.				
16						
17						
18	The United States moves for pretrial detention of the Defendant, pursuant to 18					
19	U.S.C. § 3142(e) and (f)					
20 21	1. Eligibility of Case. This case is eligible for a detention order because this					
21	case involves (check all that apply):					
23		Crime of violence (18 U.S.C.	§ 3156).			
24		Crime of Terrorism (18 U.S.C	. § 2332b (g)(5)(B)) with a maximum			
25		sentence of ten years or more.				
26	☐ Crime with a maximum sentence of life imprisonment or death.					
27		Drug offense with a maximum	sentence of ten years or more.			
28						

1		Felony offense and defendant has two prior convictions in the four categories above, or two State convictions that would otherwise fall within	
2		these four categories if federal jurisdiction had existed.	
3 4		Felony offense involving a minor victim other than a crime of violence.	
5			
6	\boxtimes	Felony offense, other than a crime of violence, involving possession or use	
7		of a firearm, destructive device (as those terms are defined in 18 U.S.C. § 921), or any other dangerous weapon.	
8		Felony offense other than a crime of violence that involves a failure to	
9		register as a Sex Offender (18 U.S.C. § 2250).	
10	\boxtimes	Serious risk the defendant will flee.	
11			
12		Serious risk of obstruction of justice, including intimidation of a prospective witness or juror.	
13	2.	Reason for Detention. The Court should detain defendant because there	
14			
15	are no conditions of release which will reasonably assure (check one or both):		
16		Defendant's appearance as required.	
17	\boxtimes	Safety of any other person and the community.	
18	3.	Rebuttable Presumption. The United States will invoke the rebuttable	
19	presumption against defendant under § 3142(e). The presumption applies because:		
20		Probable cause to believe defendant committed offense within five years of	
21		release following conviction for a qualifying offense committed while on pretrial release.	
22			
23		Probable cause to believe defendant committed drug offense with a maximum sentence of ten years or more.	
24		maximum sentence of ten years of more.	
25		Probable cause to believe defendant committed a violation of one of the	
26		following offenses: 18 U.S.C. §§ 924(c), 956 (conspiracy to murder or kidnap), 2332b (act of terrorism), 2332b(g)(5)(B) (crime of terrorism).	
27		(a) (b) (b) (c) (c) (c) (c) (c) (c) (c) (c) (c) (c	
28			

1 2 3		Probable cause to believe defendant committed an offense involving a victim under the age of 18 under 18 U.S.C. §§1591, 2241, 2242, 2244(a)(1), 2245, 2251, 2251A, 2252(a)(1) through 2252(a)(3), 2252A(a)(1) through 2252A(a)(4), 2260, 2421, 2422, 2423 or 2425.	
4	4.	Time for Detention Hearing. The United States requests the Court	
5	conduct the detention hearing:		
6	\boxtimes	At the initial appearance	
7 8		After a continuance of days (not more than 3)	
9			
10	DATED this 28th day of August, 2020.		
11		Respectfully submitted,	
12			
13		BRIAN T. MORAN United States Attorney	
14		·	
15		s/ Thomas Woods	
16		THOMAS WOODS	
17		Assistant United States Attorney	
18			
19			
20			
21			
22			
23			
24			
25			
26			
27 28			
40			